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7 Attorney for Giuseppe Russo

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
14 GIUSEPPE RUSSO,  
15 Defendant.

Case No. 2:17-cr-00243-JCM-NJK

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(Second Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Sue Fahami, Acting  
18 United States Attorney, and Jessica Oliva, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen,  
20 Assistant Federal Public Defender, counsel for Giuseppe Russo, that the Revocation Hearing  
21 currently scheduled on April 9, 2025, be vacated and continued to a date and time convenient  
22 to the Court, but no sooner than fourteen (14) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Defense counsel will be in trial in the matter of USA v. Fain on the currently  
25 scheduled revocation hearing date.  
26 2. The parties require additional time for negotiations to determine whether this  
matter may be resolved short of a contested revocation hearing.

1           3.       Mr. Russo is out of custody and does not oppose the continuance.

2           4.       The parties agree to the continuance.

3           This is the second request for a continuance of the revocation hearing.

4           DATED this 1st day of April, 2025.

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6       RENE L. VALLADARES  
7       Federal Public Defender

SUE FAHAMI  
Acting United States Attorney

8       By /s/ Joy Chen

By /s/ Jessica Oliva

9       JOY CHEN  
10      Assistant Federal Public Defender

JESSICA OLIVA  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4 Plaintiff,  
5 v.  
6 GIUSEPPE RUSSO,  
7 Defendant.  
8

Case No. 2:17-cr-00243-JCM-NJK

**ORDER**

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10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for  
11 Wednesday, April 9, 2025 at 10:30 a.m., be vacated and continued to **Wednesday, April**  
12 **23, 2025** at the hour of **10:30 a.m.**

13 DATED April 7, 2025.

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16 UNITED STATES DISTRICT JUDGE  
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